

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE**  
**EASTERN DISTRICT OF TENNESSEE**  
**NORTHERN DIVISION**

**In re Lisa Marianne Shaver**  
  
**Debtor**

**Case No. 3:21-bk-30716-SHB**  
**Chapter 7**

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**MOTION TO SEAL EXHIBITS**

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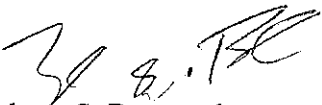
Comes now the Debtor's attorney, Zachary S. Burroughs, and hereby moves this Court, pursuant to E.D. Tenn. LBR 5005-4(m), to seal exhibits to this Motion and in support of this Motion states as follows:

1. Zachary S. Burroughs filed a Chapter 7 Bankruptcy case for the Debtor, Lisa Marianne Shaver, on April 23, 2021.
2. Prior to filing, the Debtor entered into a Pre-Petition Fee Agreement with Clark & Washington, PC, which addresses compensation for pre-petition services. After filing, the Debtor entered into a Post-Petition Fee Agreement with Clark & Washington, PC, which addresses compensation for post-petition services.
3. Said Pre-Petition Fee Agreement will be filed separately as Exhibit A to this Motion. Said Post-Petition Fee Agreement will be filed separately as Exhibit B to this Motion.
4. Zachary S. Burroughs, files this Motion pursuant to E.D. Tenn. LBR 5005-4(m) seeking an Order of the Court prohibiting remote electronic access to Exhibit A and Exhibit B to this Motion. Debtor's attorney seeks to seal these exhibits to protect attorney-client privilege as well as Debtor's attorney's work product.

5. A copy of this Motion is being served on the Debtor, the Chapter 7 Trustee, and U.S. Trustee only to avoid alerting third parties of the document at issue.

WHEREFORE, Zachary S. Burroughs, attorney for the Debtor, respectfully requests that the Court enter an Order directing the Clerk to seal Exhibit A and Exhibit B to this Motion to Seal.

April 26, 2021.

  
/s/ Zachary S. Burroughs  
Zachary S. Burroughs, # 025896  
Clark & Washington, P.C.  
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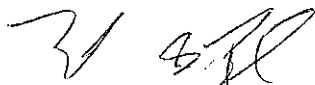
### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that true and exact copies of the foregoing Motion to Seal Exhibits, Exhibits A and B, and Proposed Order have been forwarded to the following by depositing in the U.S. Mail, postage prepaid, and/or Electronic Case Filing (ECF) on April 26, 2021.

Office of United States Trustee (ECF)  
Howard H. Baker, Jr., U.S. Courthouse  
800 Market Street Ste 114  
Knoxville, TN 37902

Ryan Jarrard (ECF)  
Chapter 7 Trustee  
800 South Gay Street  
Suite 2121  
Knoxville, TN 37979

Lisa Marianne Shaver (US MAIL)  
6713 Pheasant Lane  
Knoxville TN 37923

  
/s/ Zachary S. Burroughs  
Zachary S. Burroughs, # 025896